

Fill in this information to identify the case:

Debtor 1 Allison Reindollar
Debtor 2
United States Bankruptcy Court for the: Middle District of Pennsylvania
Case number : 19-02630

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: NewRez LLC d/b/a Shellpoint Mortgage Servicing

Court claim no.
(if known):

7

Last 4 digits of any number you use to identify the debtor's account: 3652

Property Address: 230 Ivy Drive
Manchester, PA 17345

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$0.00

Part 3: Postpetition Mortgage Payment

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$ 17,175.29

b. Total fees, charges, expenses, escrow, and costs outstanding:

+(b) \$ -278.65 (suspense)

c. **Total.** Add lines a and b.

(c) \$ 16,896.64

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

2023-12-01

Per Stipulation granted 5/9/2023 plan was to be modified to include delinquent payments totaling \$18,842.22. Modified plan not filed.

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box:

☐ I am the creditor.

☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

/s/ Joshua I. Goldman

Date 10/15/2024

Signature

Print: Joshua I. Goldman

Title Authorized Agent for Creditor

Company Padgett Law Group

If different from the notice address listed on the proof of claim to which this response applies:

Address 6267 Old Water Oak Road, Suite 203

Tallahassee FL, 32312

Contact phone (850) 422-2520

Email plginquiries@padgettlawgroup.com

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION

In Re;

Allison Reindollar

Case No.: 19-02630

Debtor(s)

Chapter: 13

CERTIFICATE OF SERVICE

I, hereby certify that on 10/15/2024, a true and correct copy of the foregoing document was served via United States Mail with adequate prepaid postage and/or electronically via the Court's ECF system:

Service by U.S. First Class Mail

Debtor
Allison Reindollar
230 Ivy Drive
Manchester, PA 17345

By Electronic Mail

Attorney for Debtor
Dawn Marie Cutaia
Fresh Start Law, PLLC
1701 West Market Street
York, PA 17404

Trustee
Jack N Zaharopoulos
Standing Chapter 13
(Trustee)
8125 Adams Drive, Suite A
Hummelstown, PA 17036

US Trustee
United States Trustee
US Courthouse
1501 N. 6th St
Harrisburg, PA 17102

/s/ Joshua I. Goldman
Joshua I. Goldman

